

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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August 8, 2022

BY ECF

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Anthony Rose*, 19 Cr. 789

Dear Judge Gardephe:

I write to respectfully request that the Court modify the conditions of Anthony Rose's bond to remove his mother's home as a security for that bond.

On November 7, 2019, Magistrate Judge Gorenstein authorized Mr. Rose's release on a \$1,000,000 personal recognizance bond secured by \$20,000 cash/property and the home of his mother, Sandra Rose. Ms. Rose passed away unexpectedly in 2021. Her surviving relatives are unable to keep up with the mortgage payments on her home and wish to sell it so as not to default. Mr. Rose asks the Court to release the property from his bond in order to enable a sale.

U.S. Pretrial Services takes no position on this request. The Government has no objection, provided that Mr. Rose's share of the proceeds from any sale are placed in an irrevocable trust for the duration of his criminal case. Thank you for considering it.

Respectfully submitted,

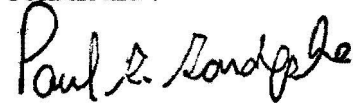
/s/ Ariel Werner
Ariel Werner, Esq.
Assistant Federal Defender
(212) 417-8770

cc: Mathew Andrews and Louis Pellegrino, Assistant U.S. Attorneys
Shannon Finneran and Jazzlyn Harris, U.S. Pretrial Services Officers

MEMO ENDORSED:

The application is granted, provided that the Defendant's share of any proceeds from any sale of his mother's home are placed in an irrevocable trust for the duration of this case.

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: August 8, 2022